



DAVID M. ESKEW

(646) 970-7342 (direct dial)
deskew@aellaw.com
aellaw.com

**256 Fifth Avenue, 5th Floor
New York, New York 10001**

December 27, 2023

By ECF

The Honorable Hector Gonzalez
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: U.S. v. Chi Kwan Wong, Crim. No. 23-88 (HG)


Dear Judge Gonzalez:

This letter is submitted jointly on behalf of defendant Chi Wong and the United States to advise the Court that the parties have reached a plea agreement in principle, obviating the need for a trial in this case. The government has advised that they are finalizing a written plea agreement, which should be completed in the next few days. Accordingly, the parties respectfully request that the Court schedule a change of plea hearing on a date that is convenient to the Court on any date on or after Monday, January 8, 2024. This will permit the government time to complete the written plea agreement and for counsel to meet with defendant to review and sign the final agreement.

We thank the Court for its consideration of this request.

Respectfully submitted,

Abell Eskew Landau LLP


By David M. Eskew
Counsel for Defendant

Cc: Miriam L. Glaser Dauermann, AUSA